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VIA ECF

The Honorable Michael J. Roemer
United States District Court
Western District of New York
Robert H. Jackson United States Courthouse
2 Niagara Square
Buffalo, NY 14202

Re: Grand'Maison v. Roswell Park Comprehensive Cancer Center, et al.;
No. 23 Civ. 00099 (JLS) (MJR)

Dear Judge Roemer:

We represent Plaintiff and write jointly with Defendants pursuant to Section 8(c) of the Case Management Plan (Dkt. No. 21), which requires the parties to inform the Court of any disputes with respect to a protocol for the search, review and production of electronically stored information ("ESI"). While the parties have not yet finalized an ESI protocol, we have met and conferred and exchanged markups of the technical aspects of such protocol and will continue to work cooperatively in an effort to resolve such disputes. The parties have also not yet agreed on a search term protocol with respect to ESI and have agreed to work together on that aspect of the protocol in conjunction with the meet and confer process as to the scope of document discovery. The parties anticipate that there may be disputes which may need to be resolved but are not currently in a position to present those disputes to the Court. We will promptly inform the Court to the extent judicial intervention is needed with respect to any aspect of the ESI protocol.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'D. E. Gottlieb', is written over a light blue circular stamp.

David E. Gottlieb

Encl.

cc: All Counsel of Record (*via* ECF)